

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

STATE OF TEXAS; STATE OF  
MISSOURI

Plaintiffs

V.

JOSEPH R. BIDEN, JR. in his official  
capacity as President of the United States,  
ET. AL.

## Defendants

No. 2:21-CV-00067-Z

**UNOPPOSED MOTION FOR LEAVE TO FILE AMICUS BRIEF IN SUPPORT  
OF THE STATE OF TEXAS AND STATE OF MISSOURI**

The Advocates for Victims of Illegal Alien Crime (“AVIAC”) respectfully request this Court’s permission to file an amicus brief in support of the State of Texas’ and State of Missouri’s motion for a preliminary injunction (ECF No. 53). Neither party opposes this motion.

Advocates for Victims of Illegal Alien Crime (“AVIAC”) is an advocacy organization founded and led by individuals, including Texans, who have lost family members because of crimes committed by illegal aliens. AVIAC’s mission is to be both a source of support for such victims across the country and an advocate for policies that will enforce the nation’s immigration laws and prevent government actors from sheltering illegal aliens, particularly criminal aliens, from deportation. AVIAC therefore takes an interest in the case at bar challenging government action that frustrates the enforcement of immigration laws.

“The extent, if any, to which an amicus curiae should be permitted to participate in a pending action is solely within the broad discretion of the district court.” *Sierra Club v. Fed. Emergency Mgmt. Agency*, 2007 WL 3472851, at \*1 (S.D. Tex. Nov. 14, 2007) AVIAC believes that its proposed amicus brief will assist this Court in deciding the issues before it. The proposed amicus brief is attached, and proposed amicus respectfully requests that this Court grant them leave to file it.

AVIAC has received no objection from either plaintiff or defendant to the filing of this motion.

Date: June 14, 2021

Respectfully submitted,

/s/ Walter S. Zimolong, Esq.

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